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10 *Attorneys for Fire Victim Trustee*

11  
12 **UNITED STATES BANKRUPTCY COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**  
19 **COMPANY,**

20 **Debtors.**

- 21 ☐ Affects PG&E Corporation  
22 ☐ Affects Pacific Gas and Electric Company  
23 ☒ Affects both Debtors

24 *\*All papers shall be filed in the Lead Case,*  
25 *No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**SECOND SUPPLEMENT TO MOTION  
OF THE FIRE VICTIM TRUSTEE  
PURSUANT TO FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 2004 FOR  
ENTRY OF AN ORDER AUTHORIZING  
SERVICE OF SUBPOENAS ON THE  
SUBROGATION WILDFIRE TRUST,  
SUBROGATION WILDFIRE  
CLAIMANTS, AND INSURERS WITH  
CLAIM FILES**

[No Hearing Required Per L.B.R 2004-1(a)]

1 The Honorable John K. Trotter (Ret.), in his capacity as the Fire Victim Trustee  
2 (the “**Trustee**”), by and through his undersigned counsel, hereby submits this Second Supplement  
3 to the Rule 2004 Motion (Dkt. No. 9483) filed on November 9, 2020.<sup>1</sup>

4 In the Supplement to the Rule 2004 Motion filed on November 13, 2020 (Dkt. No. 9514)  
5 (the “**First Supplement**”), the Trustee specifically identified 402 insurers on “Exhibit 1” thereto,  
6 including related parties and affiliates, that have Claim Files and claims-related documents for  
7 insured fire victims. In addition, as set forth in the Rule 2004 Motion, the Wildfire Subrogation  
8 Trust is also in possession of a substantial amount of insurance information that the Trustee needs  
9 to administer fire victim claims in accordance with the Plan and the Confirmation Order.

10 Since the Trustee filed the First Supplement, the Trustee has reached agreements with  
11 various parties that substantially narrow the scope of the relief sought by the Rule 2004 Motion.

12 **Cooperating Carriers.** The Trustee has had discussions with multiple insurance carriers  
13 that have expressed a willingness to cooperate with the Fire Victim Trust and voluntarily and  
14 promptly provide insurance information to the Fire Victim Trust without the service of a Subpoena  
15 (collectively, the “**Cooperating Carriers**”). The Cooperating Carriers are identified on **Exhibit A**  
16 to this Second Supplement. The Cooperating Carriers include 393 of the insurers identified on  
17 Exhibit 1 to the First Supplement.

18 Based on the representations made by the Cooperating Carriers to the Fire Victim Trust, the  
19 Fire Victim Trust hereby withdraws without prejudice the Rule 2004 Motion to the extent that it  
20 seeks authority to serve Subpoenas on the Cooperating Carriers. Such withdrawal is without  
21 prejudice to the rights of the Fire Victim Trust and the Cooperating Carriers. If any Cooperating  
22 Carrier does not provide insurance information to the Fire Victim Trust on a timely basis, the Fire  
23 Victim Trust reserves its right to renew its request for a Rule 2004 examination as to such party.

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27 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Rule 2004 Motion.  
28

1        **Non-Cooperating Carriers.** Multiple insurance carriers have not expressed a willingness  
2 to cooperate with the Fire Victim Trust and voluntarily and promptly provide insurance information  
3 to the Fire Victim Trust (collectively, the “**Non-Cooperating Carriers**”). The Non-Cooperating  
4 Carriers are identified on **Exhibit B** to this Second Supplement. The Non-Cooperating Carriers  
5 include 9 of the insurers identified on Exhibit 1 to the First Supplement. The Rule 2004 Motion, as  
6 amended by the First Supplement and the Second Supplement, seeks authority to serve Subpoenas  
7 on the Non-Cooperating Carriers.

8        **Wildfire Subrogation Trust.** The Trustee has worked diligently to reach an agreement  
9 with the Wildfire Subrogation Trust pursuant to which the Wildfire Subrogation Trust would  
10 voluntarily and promptly provide insurance information to the Fire Victim Trust. The Trustee’s  
11 counsel provided Wildfire Subrogation Trust’s counsel with a proposed stipulated protective order  
12 on November 12, 2020 and November 18, 2020.

13        As of the date of this Second Supplement, the Wildfire Subrogation Trust and the Trustee  
14 have yet to reach an agreement on a proposed stipulated protective order that would provide the  
15 Trustee with access to insurance information that he needs to administer fire victim claims. The  
16 parties are continuing to negotiate. However, since the Wildfire Subrogation Trust and the Trustee  
17 have yet to reach an agreement, the Wildfire Subrogation Trust remains a party that is subject to the  
18 Rule 2004 Motion. If the Rule 2004 Motion is granted as to the Wildfire Subrogation Trust, and a  
19 Subpoena is served on the Wildfire Subrogation Trust in accordance with an Order from this Court,  
20 and the parties reach an agreement on a stipulated protective order, the Trustee would withdraw the  
21 Subpoena as a part of such agreement.

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1 For the reasons set forth in the Rule 2004 Motion, the First Supplement and this Second  
2 Supplement, the Trustee respectfully seeks the entry of an order pursuant to Bankruptcy Rule 2004  
3 authorizing the Trustee to serve Subpoenas on the Non-Cooperating Carriers and the Wildfire  
4 Subrogation Trust so that payments can be made to fire victims in accordance with the Plan and the  
5 Confirmation Order.

6 DATED: November 20, 2020

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*Counsel to the Fire Victim Trustee and the  
Claims Administrator for the Fire Victim Trust*

## EXHIBIT “A”

## FVT Insurance Companies

	Insurance Company
1.	21st Century Insurance Company
2.	ACE American Insurance Company
3.	Admiral Insurance Company
4.	Adventist Risk Management, Inc.
5.	Aegis Security Insurance Company
6.	AGCS Marine Insurance Company
7.	Agent Alliance Insurance Company
8.	AIG Europe Limited
9.	AIG Property Casualty Company
10.	Alliance United Insurance Company
11.	Allianz Global Risks US Insurance Company
12.	Allianz Marine Insurance Company
13.	Allied P&C Insurance Company
14.	Allied World Assurance Company (US) Inc.
15.	Allied World Assurance Company, Ltd
16.	Allied World Specialty Insurance Company
17.	Allmerica Financial Benefit Insurance Company
18.	Allstate Fire and Casualty Insurance Company
19.	Allstate Indemnity Company
20.	Allstate Insurance Company
21.	Allstate Northbrook Indemnity Company
22.	Allstate Property and Casualty Insurance Company
23.	Am. Reliable Insurance Company
24.	AMCO Insurance Company
25.	American Alternative Insurance Company
26.	American Automobile Association
27.	American Automobile Insurance Company
28.	American Bankers Insurance Company
29.	AMERICAN BANKERS INSURANCE COMPANY
30.	American Casualty Company
31.	American Economy
32.	American Family Home Insurance Company
33.	American Fire & Casualty
34.	American Guarantee & Liability Insurance Company
35.	American Home Assurance Company
36.	American Insurance Company (The)
37.	American Modern Home Insurance Company
38.	American Modern Insurance
39.	American National Insurance Company
40.	American National Property and Casualty
41.	American Reliable Insurance Company
42.	AMERICAN SECURITY INSURANCE CO
43.	American States
44.	American States Preferred Insurance Company

45.	American Strategic Insurance Corp
46.	American Zurich Insurance Company
47.	Ameriprise
48.	AmGUARD Insurance Company
49.	Amica Mutual Insurance Company
50.	AmTrust International
51.	AmTrust Syd 1206
52.	ANPAC
53.	Arch Insurance Company
54.	Arch Specialty Insurance Company
55.	Argo Group
56.	ARGONAUT GREAT CENTRAL INSURANCE COMPANY
57.	Armed Forces Insurance Exchange
58.	Ascot Underwriting Ltd.
59.	ASI Select Insurance Corp
60.	Aspen American Insurance Company
61.	Aspen Insurance Company
62.	Aspen Insurance UK Limited
63.	Aspen Specialty Insurance Company
64.	Associated Indemnity Corporation
65.	Association of California Water Agencies Joint Powers Insurance Authority
66.	Asta Managing Agency Limited
67.	Atlantic Specialty Insurance Company
68.	AWAC London Lloyds
69.	AXIS INSURANCE COMPANY
70.	AXIS Specialty Europe SE
71.	Bankers Standard Insurance Company
72.	Barbican Managing Agency Limited
73.	Berkley National Insurance Company
74.	Berkley Regional Insurance Company
75.	Berkshire Hathaway Specialty Insurance
76.	Brit Global Specialty
77.	Brit UW Ltd
78.	Butte Schools Self-Funded Programs Joint Powers Authority
79.	CAIC
80.	California Automobile Insurance Company
81.	California Capital Insurance Company
82.	California Casualty Indemnity Exchange
83.	CALIFORNIA FAIR PLAN ASSOCIATION
84.	California Mutual
85.	Canopus Managing Agents Limited
86.	Canopus US Insurance, Inc.
87.	Capitol Indemnity Corporation a/s/o Assisted Freedom, Inc. dba Home Instead Senior Care #377
88.	Capitol Indemnity Corporation a/s/o Chul Kim dba Foster's Freeze
89.	Capitol Specialty Insurance Company
90.	Capitol Specialty Insurance Company a/s/o Ben Lucas d/b/a Eye of Jade Tattoo
91.	CAPRI
92.	Catholic Mutual Group

93.	Catlin Specialty Insurance Company
94.	Century National Insurance Company
95.	Certain Underwriters at Lloyd's of London
96.	Certain Underwriters at Lloyd's, London
97.	Certain Underwriters at Lloyds, London-Brit Syndicate 2987
98.	Certain Underwriters at Lloyds, London-Brit Syndicate 2987 and Brit Syndicate 2988
99.	Chubb Custom Insurance Company
100.	Church Insurance Company of Vermont
101.	Church Mutual Insurance Company
102.	CIC
103.	Cincinnati Insurance Company
104.	Citation Insurance Company
105.	Citizens Insurance Company of America
106.	Citizens Insurance Company of Midwest
107.	Civil Service Employees Insurance Company
108.	COAST NATIONAL INSURANCE COMPANY
109.	COLONY INSURANCE COMPANY
110.	Commerce West Insurance Company
111.	Continental Casualty Company
112.	Continental Insurance Company
113.	
114.	Crestbrook Insurance Company
115.	Crestmont Insurance Company
116.	Crusader Insurance Company
117.	CSAA
118.	CSE Safeguard Insurance Company
119.	CSEICO
120.	CSESG
121.	Dentists Insurance Company
122.	Depositors Insurance Company
123.	Eagle West Insurance Company
124.	Employers Insurance Company of Wausau
125.	Employers Mutual Casualty Company
126.	Encompass Insurance Company
127.	Endurance American Specialty
128.	Endurance American Specialty Insurance Company
129.	Endurance Specialty Insurance Company
130.	Essentia Insurance Company
131.	Esurance
132.	Evanston Insurance Company
133.	Everest Indemnity Insurance Company
134.	Everest National Insurance Company
135.	Everest Reinsurance Company
136.	Farmers Insurance Company of Idaho
137.	Farmers Insurance Company of Oregon
138.	Farmers Insurance Exchange
139.	FARMERS SPECIALTY INSURANCE COMPANY
140.	Federal Insurance Company



141.	Federated Mutual Insurance Company
142.	Federated Service Insurance Company
143.	FFIC
144.	Fidelity and Deposit Company of Maryland
145.	Fidelity and Guaranty Insurance Underwriters Inc.
146.	Financial Indemnity Company
147.	Financial Pacific Insurance Company
148.	Fire Insurance Exchange
149.	Fireman's Fund Insurance Company
150.	First American Property & Casualty
151.	First American Specialty Insurance
152.	First National Insurance Company of America
153.	First Specialty Insurance Corporation
154.	Florists' Mutual Insurance Company
155.	FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN
156.	FOREMOST PROPERTY AND CASUALTY INSURANCE COMPANY
157.	FOREMOST SIGNATURE INSURANCE COMPANY
158.	
159.	GAR
160.	GCUBE Insurance Services, Inc.; GCUBE Underwriting Limited
161.	GEICO
162.	GEICO Advantage
163.	GEICO CASUALTY COMPANY
164.	GEICO GENERAL INSURANCE COMPANY
165.	GEICO INDEMNITY COMPANY
166.	Gencon Insurance Company of Vermont
167.	General Casualty Company of Wisconsin
168.	General Insurance Company of America
169.	General Security Company of Arizona
170.	General Security Indemnity Company of America
171.	General Security Indemnity Company of Arizona
172.	Generali US Branch
173.	GIC
174.	Golden Eagle Insurance
175.	Gotham Insurance Company
176.	GOVERNMENT EMPLOYEES INSURANCE COMPANY
177.	Grange Insurance Association
178.	Granite State Insurance Company
179.	Great American Alliance Insurance Company
180.	Great American Assurance Company
181.	Great American E&S Insurance Company
182.	Great American Insurance Company
183.	Great American Insurance Company of New York
184.	Great American Spirit Insurance Company
185.	Great Divide Insurance Company
186.	Great Lakes
187.	Great Northern Insurance Company
188.	Greenwich Insurance Company

189.	GuideOne Mutual Insurance Company
190.	GuideOne Specialty Mutual Insurance Company
191.	
192.	Hanover American Insurance Company
193.	Hanover Insurance Company
194.	Hartford Accident & Indemnity Company
195.	Hartford Casualty Insurance Company
196.	Hartford Fire Insurance Company
197.	Hartford Underwriters Insurance Company
198.	HDI Global SE
199.	Homeland Insurance Company of New York
200.	Homesite Insurance Company of California
201.	Homesite Insurance Company of the Midwest
202.	Horace Mann Insurance Company
203.	Horace Mann Property & Casualty
204.	Houston Casualty Company
205.	Houston Casualty Company, London Branch
206.	Houston Specialty US
207.	Hudson Insurance Company
208.	Illinois Farmers Insurance Company
209.	Illinois Union Insurance Company
210.	Indemnity Insurance Company of North America
211.	Indian Harbor Insurance Company
212.	Infinity Insurance Company
213.	Infinity Select Insurance Company
214.	Integon National Insurance Co
215.	Integon Preferred Insurance Company
216.	Interinsurance Exchange of the Automobile Club
217.	International Insurance Company of Hannover SE
218.	Interstate Fire & Casualty Company
219.	Ironshore Indemnity Inc
220.	Ironshore Insurance LTD
221.	Ironshore Specialty Insurance Company
222.	Kemper Independence Insurance Company
223.	Kookman Best Insurance Company, Ltd. US Branch
224.	Landmark American Insurance Company
225.	Lemonade Insurance Company
226.	Lexington Insurance Company - Boston
227.	Lexington Insurance Company
228.	Lex-London a Div. of AIG Europe Ltd.
229.	
230.	Liberty Insurance Corporation
231.	Liberty Managing Agency Limited
232.	Liberty Mutual Fire Insurance Company
233.	Liberty Mutual Insurance Company
234.	Liberty Mutual Insurance Europe SE (Lux)
235.	Lloyds (Atrium)
236.	Lloyds (Novae)

237.	LM General Insurance Company
238.	LM Insurance Corporation
239.	
240.	Mapfire Insurance Company
241.	Markel American Insurance Company
242.	Markel Bermuda Limited
243.	Markel Insurance Company
244.	Markel International Insurance Company, Inc.
245.	Mass Bay Insurance Company
246.	Maxum Indemnity Company
247.	MCC
248.	Mennonite Aid Plan of the Pacific Coast
249.	Merced Property & Casualty Company in Liquidation
250.	Mercury Casualty Company
251.	Mercury Insurance Company
252.	Mesa Underwriters Specialty
253.	Metropolitan Direct Property and Casualty Insurance Company
254.	MIC
255.	Mic General Insurance Corp.
256.	Mid-Century Insurance Company
257.	Midvale Indemnity Company
258.	Mitsui Sumitomo Insurance Company of America
259.	Monterey Insurance Company
260.	MS Amlin Underwriting Limited
261.	National Casualty Company
262.	National Fire & Marine Insurance Company
263.	National Fire Insurance Company of Hartford
264.	National General Assurance Company
265.	National General Insurance Company
266.	National General Premier Insurance Company
267.	National Surety Corporation
268.	National Union Fire Insurance Company
269.	National Union Fire Insurance Company of Pittsburgh, PA
270.	Nationwide Agribusiness Ins NAIC
271.	Nationwide Insurance Company of America
272.	Nationwide Mutual Fire Insurance Company
273.	Nationwide Mutual Insurance Company
274.	Nautilus Insurance Company
275.	New Hampshire Insurance Company
276.	New York Marine and General Insurance Company
277.	Nonprofits Insurance Alliance of California
278.	North Light Specialty Insurance Company
279.	Northfield Insurance Company
280.	NOVA Casualty Company Program
281.	Novae 2007 Syndicate
282.	
283.	Ohio Casualty
284.	Ohio Security

285.	Oregon Mutual Insurance
286.	Pacific Indemnity Company
287.	Pacific Property and Casualty Company
288.	Pacific Specialty Insurance Company
289.	
290.	Peerless Indemnity Insurance
291.	Peerless Insurance Company
292.	Penn-Star Insurance Company
293.	Permanent General Assurance Corporation
294.	Pharmacists Mutual Insurance Company
295.	Philadelphia Indemnity Insurance Company
296.	Praetorian Insurance Company
297.	Privilege Underwriters Reciprocal Exchange
298.	Progressive Casualty Insurance Company
299.	Progressive Direct Insurance Company
300.	Progressive Express Insurance Company
301.	Progressive Premier Insurance Company of IL
302.	Progressive Select Insurance Company
303.	Progressive Universal Insurance Company
304.	Progressive West Insurance Company
305.	Property & Casualty Insurance Company Of Hartford
306.	
307.	QBE European Operations
308.	QBE Insurance Corporation
309.	Regent Insurance Company
310.	Residence Mutual Insurance Company
311.	Riverport Insurance Company
312.	RiverStone Managing Agency Ltd, for and on behalf of syndicate 780
313.	RiverStone Managing Agency Limited as successor to Advent Underwriting Limited
314.	Royal & Sun Alliance Insurance Company/Certain Underwriters at Lloyds
315.	Royal & Sun Alliance Insurance PLC U.K.
316.	RSUI Group, Inc.
317.	RSUI Indemnity Company
318.	SAFECO Insurance Company of America
319.	SAFECO Insurance Company of Illinois
320.	Safeco Insurance Company of Oregon
321.	Scottsdale Indemnity Company
322.	Scottsdale Insurance Company
323.	Security National Insurance Company
324.	Seneca
325.	Sentinel Insurance Company, Ltd.
326.	Sentry Insurance A Mutual Company
327.	Sentry Select Insurance Company
328.	Sequoia Insurance Company
329.	Somo Japan Insurance Company of America
330.	Sompo International Insurance
331.	Spinnaker Insurance Company
332.	St Paul Fire and Marine

333.	STANDARD GUARANTY INSURANCE CO
334.	Star Insurance Company
335.	Starr Surplus Lines insurance Company
336.	State Farm County Mutual Insurance Company of Texas
337.	State Farm Fire & Casualty Company
338.	State Farm General Insurance Company
339.	State Farm Mutual Automobile Insurance Company
340.	State National Insurance Company
341.	Steadfast Insurance Company
342.	Stillwater Insurance Company
343.	Stillwater Property & Casualty Insurance Company
344.	Sutter Insurance Company
345.	Technology Insurance Company, Inc.
346.	The Fidelity & Deposit Company of Maryland
347.	The First Liberty Insurance Corp
348.	The Hanover Casualty Company
349.	The Insurance Company of the State of Pennsylvania
350.	The North River Insurance Company
351.	The Northfield Insurance Company
352.	The Princeton Excess & Surplus Lines Insurance Company
353.	The Standard Fire Insurance Company
354.	The Travelers Home and Marine Insurance Company
355.	The Travelers Indemnity Company
356.	The Travelers Indemnity Company of America
357.	
358.	Tokio Marine America Insurance Company
359.	Tokio Marine Kiln Syndicates 510 & 1880
360.	Topa Insurance Company
361.	Transportation Insurance Company
362.	Travelers Casualty Insurance Company of America
363.	Travelers Commercial Insurance Company
364.	Travelers Indemnity Company of Connecticut
365.	Travelers Property Casualty Company of America
366.	Travelers Property Casualty Insurance Company
367.	Truck Insurance Exchange
368.	Trumbull Insurance Company
369.	Tudor Insurance Company
370.	TWE Insurance Company Pte. Ltd.
371.	Twin City Fire Insurance Company
372.	Unigard Insurance Company
373.	United Financial Casualty Company
374.	United Fire and Casualty Insurance Company
375.	United National Insurance Company
376.	United Specialty Insurance Company
377.	United States Fire Insurance Company
378.	United States Liability Insurance Company
379.	Unitrin Direct Insurance Company
380.	Unitrin Direct Property & Casualty Company

381.	Universal North American Insurance Company
382.	USAA
383.	Valley Forge Insurance Company
384.	Vibe Corporate Member Limited
385.	Vibe Syndicate 5678
386.	Vibe Syndicate Management Limited
387.	Victoria Fire & Casualty Company
388.	Vigilant Insurance Company
389.	Viking Insurance Company of Wisconsin
390.	VOYAGER INDEMNITY INSURANCE CO
391.	Wawanesa General Insurance Company
392.	Wesco Insurance Company
393.	West American
394.	Westchester Surplus Lines Insurance Company
395.	Western Heritage Insurance Co
396.	Western Mutual Insurance Company
397.	Western World Insurance Company
398.	Westport Insurance Company
399.	Westport Insurance Corporation
400.	XL Insurance America, Inc.
401.	Zenith Insurance
402.	Zurich American Insurance Company

EXHIBIT “B”

FVT Insurance Companies	
	Insurance Company
113.	Corporate Deals - Reinsurance
158.	Freedom Specialty / Whic
191.	Hamilton Reinsurance
229.	Lex-London, a Division of Chartis Europe Limited
239.	LTD
282.	Occidental Fire and Casualty Company of North Carolina
289.	Peconic Insurance Company of Phoenix, AZ
306.	Property Joint Underwriting Association
357.	Titan Insurance Company